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UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

NICHOLAS COLAIZZI,

Plaintiff,

v.

BANK OF AMERICA, N.A., and EQUIFAX INFORMATION SERVICES, LLC.,

Defendant.

Case No.: 2:14-cv-02053-GMN-NJK

STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO DEFENDANT'S MOTION TO DISMISS

[FIRST REQUEST]

Stipulation 1 of 4

Plaintiff, NICHOLAS COLAIZZI ("Plaintiff"), and Defendant, BANK OF AMERICA, N.A. ("Defendant"), hereby submit the following Stipulation to Extend Time for Plaintiff to Respond to Defendant's Motion to Dismiss. The current deadline is set for August 27, 2015.

- 1. Defendant filed its Motion to Dismiss Plaintiff's First Amended Complaint [Dkt. No. 23] on August 10, 2015.
- 2. Plaintiff and Defendant have agreed to an extension of time of 14 days, up to and including September 10, 2015 for Plaintiff to respond to Defendant's Motion To Dismiss.
- 3. This request is not made for purposes of delay, but rather to allow Plaintiff to fully brief the Motion brought by Defendant, and perhaps explore settlement.

The parties therefore respectfully request this Court enter an order granting an extension of time of 14 days, up to and including September 10, 2015, for Plaintiff to respond to Defendant's Motion to Dismiss.

DATED: August 25, 2015

AKERMAN LLP

KAZEROUNI LAW GROUP, APC

<u>/s/ Matthew Knepper</u>

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IT IS SO ORDERED

Gloria M. Navarro, Chief Judge United States District Court

DATED: August 26, 2015

SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to counsel for Defendant, and that I have obtained their authorization to affix their electronic signature to this document.

Dated: August 10, 2015 KAZEROUNI LAW GROUP

By: /s/ Danny Horen

DANNY HOREN, ESQ.

ATTORNEY FOR PLAINTIFF

Stipulation 4 of 4